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TRANSMITTAL OF APPEAL BRIEF (Large Entity)

Docket No.  
4-165US-FE

Inventor Application Of: Yoshinori Ohta, et al.

JPW

Application No.	Filing Date	Examiner	Customer No.	Group Art Unit	Confirmation No.
09/534,309	March 23, 2000	Joshua D. Campbell	21254	2178	9768

Invention: APPARATUS AND MEHTOD FOR CONTROLLING DISPLAY OF DATABASE SEARCH ITEMS

COMMISSIONER FOR PATENTS:

Transmitted herewith in triplicate is the Appeal Brief in this application, with respect to the Notice of Appeal filed on

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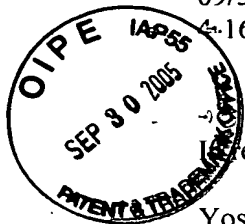
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Inter Application of

Yoshinori Ohta, et al.

Serial No.: 09/534,309

Group Art Unit: 2178

Filed: March 22, 2000

Examiner: Joshua D. Campbell

For: APPARATUS AND METHOD FOR CONTROLLING DISPLAY OF DATABASE  
SEARCH ITEMS

Honorable Commissioner of Patents  
Alexandria, Virginia 22313-1450

**APPELLANT'S BRIEF ON APPEAL**

Sir:

Appellant respectfully appeals the final rejection of claims 1-19 in the Office Action dated May 2, 2005. A Notice of Appeal (with a Petition for One Month Extension of Time) was filed herein on August 12, 2005.

**I. REAL PARTY IN INTEREST**

The real party in interest is Fuji Photo Film Co., Ltd., assignee of 100% interest of the above-referenced patent application.

**II. RELATED APPEALS AND INTERFERENCES**

There are no other appeals or interferences known to Appellant, Appellant's legal representative or Assignee which would directly affect or be directly affected by or have a bearing on the Board's decision in this appeal.

**III. STATUS OF CLAIMS**

Claims 1-19 are all the claims presently pending in the application and are set forth fully in the attached Appendix.

Claims 1-10 and 19 stand rejected under 35 U.S.C. §103(a) as unpatentable over U.S.

Patent No. 5,781,773 to Vanderpool et al. (hereinafter "Vanderpool") in view of Sheffield (U.S. Pat. No. 5,832,481) (hereinafter "Sheffield"). Claims 11-18 stand rejected under 35 U.S.C. §103(a) as unpatentable over Vanderpool and Sheffield, and further in view of Blinn et al. (U.S. Patent No. 5,897,622) (hereinafter "Blinn").

Appellant respectfully appeals these rejections.

#### IV STATEMENT OF AFTER-FINAL AMENDMENTS

Appellant notes that an Amendment which made minor amendments to claims 1, 6 and 11 was filed on July 26, 2005. In an Advisory Action dated August 2, 2005, the Examiner stated that the Amendment would be entered, but that the Amendment did not place the application in condition for allowance because:

*"The examiner believes that the rejection as previously presented is proper and thus the rejection will be maintained. Specifically, regarding the independent claims (1 and 6), the examiner agrees that Vanderpool does not disclose a method in which to add and modify data tables in a database. However, as previously stated Sheffield discloses a method in which any items in database tables can be edited, which includes adding and modifying. The motivation provided in the rejection is also proper because this interface does provide an easy to use efficient method for the user to interact with the database. Also, it is unclear to the examiner how the invention of Vanderpool and Sheffield could be unrelated, Vanderpool discloses a method of controlling the display of database search items and Sheffield discloses a customizing tool for changing items in a database, a method of editing a database would be an intuitive addition, and be considered related to any application that deals with user interaction with a database (i.e., the invention of Vanderpool)".*

Appellant respectfully disagrees with the Examiner, and submits that all of the claims are allowable. The pending claims are included in the Appendix attached hereto.

## V. SUMMARY OF THE INVENTION

The claimed invention (e.g., as recited in **independent claim 1**), is directed an apparatus for controlling display of database search items. The Apparatus includes a database including an element-data storage table (e.g., see Application at Figure 3) in which has been stored, on a field-by-field basis, element data corresponding to the fields, an item-name table (e.g., see Application at Figure 4) which stipulates, field-by-field, an item name character (e.g., item-name number) that corresponds to a search-item name (e.g., product category, product name, etc.) and a field name (e.g., character data string 1, character data string 2, etc.), and a display-item designation table (e.g., see Application at Figure 5) that stores ordered display-item data (e.g., page number "1", item order "1", etc.) corresponding to the item name character (e.g., item-name number "1", item-name number "2", etc.) for an ordered display on a display unit, the ordered display being determined by a user. The apparatus further includes a select-command input device for applying a select command for designating the ordered display-item data, a display-item data read-out device for reading out, from the display-item designation table, the ordered display-item data that conforms to the select command applied by the select-command input device, a search-item name read-out device for reading out, from the item-name table, the search-item name to be displayed on the display unit, the search-item name being designated by the ordered display-item data read out by the display-item data read-out device, a display control unit for displaying the search-item name, which has been read out by the search-item name read-out device, on the display unit as a database search-item name, and a customizing tool for changing search items displayed on a search page by inputting at least one of, change-targeted item-name data for changing a search-item name in the item-name table (e.g., see Application at Figures 4 and 6; Figures 7 and 8), data representing an additional search-item name for adding a search-item name to the item-name table(e.g., see Application at Figures 4 and 6; Figures 7 and 8), display-item change data for changing a display-item in the display-item designation table (e.g., see Application at Figures 5 and 13; Figures 7 and 14), and display-item add-on data for adding on a display-item to the display item designation table (e.g., see Application at Figures 5 and 13; Figures 7 and 14).

Another aspect of the claimed invention (e.g., as recited in **independent claim 6**) is directed to a method of controlling display of search items of a database including an

element-data storage table in which has been stored, on a field-by-field basis, element data corresponding to the fields, an **item-name table** which stipulates, field-by-field, an item name character that corresponds to a search-item name and a field name, and a **display-item designation table** that stores ordered display-item data corresponding to the item name character for an ordered display determined by a user on a display unit. The method includes applying a select command for designating the ordered display-item data, reading out, from the display-item designation table, the ordered display-item data that conforms to the select command applied, reading out, from the item-name table, a search-item name to be displayed on the display unit, the search-item name being designated by the ordered display-item data read out, displaying the search-item name, which has been read out, on the display unit as a database search-item name in an ordered display determined by a user, and changing search items displayed on a search page by using a customizing tool, the changing the search items including at least one of inputting change-targeted item-name data for changing a search-item name in the item-name table, inputting data representing an additional search-item name for adding a search-item name to the item-name table, inputting display-item change data for changing a display-item in the display-item designation table, and inputting display-item add-on data for adding on a display-item to the display item designation table.

Another aspect of the claimed invention (e.g., as recited in **independent claim 19**) is directed to an apparatus for controlling display of database search items. The apparatus includes a database including a general purpose table (e.g., Application at Figure 3) which stores data corresponding to a plurality of products according to a data number, an **item name definition table** (e.g., Application at Figure 4) which stores a plurality of search items according to an item name character, and a **page definition table** (e.g., Application at Figure 5) that stores an item name character and an order of display for a search item in the plurality of search items to be displayed on a search page. The apparatus also includes a customizing tool for changing search items displayed on the search page by at least one of adding data to, deleting data from, and changing data in at least one of the item name definition table and the page definition table.

Conventionally, a database is created by designing tables constructed within the database and configuring a scheme that is in line with a specific task. Importantly, since changes or additions to the names of the search items (e.g., search criteria) in a database

involve changing the database per se, this is inevitably carried out by an expert having thorough knowledge of databases. That is, a user who is not accustomed to handling databases will find difficulty in changing or adding to the names of search items (e.g., search criteria) (Application at page 1, lines 12-27).

The claimed invention, on the other hand, includes an item-name table which stipulates, field-by-field, an item name character that corresponds to a search-item name and a field name; and a display-item designation table that stores ordered display-item data corresponding to said item name character for an ordered display on a display unit, the ordered display being determined by a user (Application at Figures 4-5). These unique features allow the search items displayed on a search page to be easily changed by simply inputting at least one of change-targeted item-name data, data representing an additional search-item name, display-item change data, and display-item add-on data. (Application at Figures 4-8 and 13-14; page 4, line 13-page 5, line 15). That is, these novel features allow a user not accustomed to handling databases to easily make **changes or additions to the search items on a search page** (Application at page 5, lines 23-25).

For example, Figures 4-8 and 13-14 illustrate how a search page may easily be "customized" using the customizing tool according to an exemplary aspect of the claimed invention. Figure 4 illustrates an item-name table (e.g., item name definition table) which stores an item name character (e.g., "1", "2", etc.) corresponding to a search-item name (e.g., "product category", "product name", etc.) and a field name (e.g., "character data string 1", "character data string 2", etc.). Figure 5 illustrates a display-item designation table (e.g., page definition table) which stores display-item data (e.g., page number "1", item order "1", etc.) corresponding to the item name character (e.g., item number "1", item number "2", etc.).

Thus, for example, the item-name table in Figure 4 may generate the search page illustrated in Figure 7. However, **the search items in this search page** may easily be changed to those of Figure 8 (e.g., change "product category" to "product class", change "manufacture name" to "name of manufacturing company", and change "weight" to "poundage") by simply using the customizing tool to change the item name table to that in Figure 6.

Similarly, the display-item designation table in Figure 5 may generate the search page illustrated in Figure 7. However, **the search items of this search page** may easily be

4-165US-FF

changed to those of Figure 14 (e.g., remove "sales date" and move "product category" from the first search item displayed to the third search item displayed) by simply using the customizing tool to change the display-item designation table to that in Figure 13.

Thus, as noted above, the unique features of the claimed invention allow the **search items displayed on a search page** to be easily changed by simply inputting at least one of change-targeted item-name data, data representing an additional search-item name, display-item change data, and display-item add-on data. Nowhere are these novel features taught or suggested by the prior art.

## VI. GROUNDS OF REJECTION TO BE REVIEWED

The grounds of rejection to be reviewed by the Board of Patent Appeals and Interferences include:

- 1) the rejection of claims 1-10 and 19 under 35 U.S.C. §103(a) over U.S. Patent No. 5,781,773 to Vanderpool et al. (hereinafter "Vanderpool") in view of Sheffield (U. S. Pat. No. 5,832,481) (hereinafter "Sheffield"); and
- 2) the rejection of claims 11-18 under 35 U.S.C. §103(a) as unpatentable over Vanderpool and Sheffield, and further in view of Blinn et al. (U.S. Patent No. 5,897,622) (hereinafter "Blinn").

## VIII. ARGUMENT

### A. The Rejection of claims 1-10 and 19 under 35 U.S.C. § 103(a) being allegedly unpatentable over Vanderpool et al. (US Patent Number 5,781,773) in view of Sheffield (US Patent Number 5,832,481)

As set forth on pages 2-3 of the Office Action dated December 15, 2004, the Examiner rejected claims 1-10 and 19 under 35 U.S.C. § 103(a) being allegedly Vanderpool et al. (US Patent Number 5,781,773) in view of Sheffield (US Patent Number 5,832,481) stating:

*"Regarding independent claims 1, 6, and 19, Vanderpool et al. discloses a system that displays searched items in a database (column 3, lines 21-24 of Vanderpool et al.). Vanderpool et al. discloses two tables contained within a database, one of these tables*

*contains the full data items and user inputs including terms of search for the data items, while the other table contains parts of the full data items that are to be displayed, also field names are displayed and listed as a part of the table (Figure 5 and column 6, lines 34-44 of Vanderpool et al.). This database is accessed by using a computer implemented searching system which shows the results on a display apparatus (column 3, lines 21-24 of Vanderpool et al.). This system has the ability to access the databases and thus can be thought of as a read-out device for all elements and tables contained within the database.*

*Vanderpool et al. does not disclose a system in which the relational database uses three tables for the search and display system. However, the table driven database disclosed by Vanderpool et al. has the same functionality as the applicants' invention. There is no functional difference between one table that contains two delineated data types and two tables that contain only one type each. It would have been obvious to one of ordinary skill in the art at the time the invention was made to have used three tables in the database for the display system of Vanderpool et al. because the table disclosed by Vanderpool et al. which contains the full data items and the user inputs acts as a double-table.*

*Vanderpool et al. also does not disclose a method in which the user may order the data in the tables or the ability to add and modify items in the data tables of the database. However, Sheffield discloses a method of editing items in tables of a database. Editing abilities include adding, modifying, deleting, and sorting (order) items contained within the tables of a relational database (column 22, line 60-column 23 line 9 of Sheffield). It would have been obvious to one of ordinary skill in the art at the time the invention was made would to have used the method of Sheffield applied into the system of Vanderpool et al. because it would have provided an easy to use, efficient interface between the user and the database itself.*

***Regarding dependent claim 2-5, all of these claims of the applicant's disclosure entail nothing more than the ability to edit data and add data into a table in a relational database. Vanderpool et al. also does not disclose a method in which the user may order the data in the tables or the ability to add and modify items in the data tables of the database. However, Sheffield discloses a method of editing items in tables of a database. Editing abilities include adding, modifying, deleting, and sorting (order) items contained within the tables of a relational database (column 22, line 60-column 23 line***



9 of Sheffield). It would have been obvious to one of ordinary skill in the art at the time the invention was made would to have used the method of Sheffield applied into the system of Vanderpool et al. because it would have provided an easy to use, efficient interface between the user and the database itself.

**Regarding dependent claims 7-10**, all of these claims of the applicant's disclosure entail nothing more than the ability to edit data and add data into a table in a relational database. Vanderpool et al. also does not disclose a method in which the user may order the data in the tables or the ability to add and modify items in the data tables of the database. However, Sheffield discloses a method of editing items in tables of a database. Editing abilities include adding, modifying, deleting, and sorting (order) items contained within the tables of a relational database (column 22, line 60-column (sic) 23 line 9 of Sheffield). It would have been obvious to one of ordinary skill in the art at the time the invention was made would to have used the method of Sheffield applied into the system of Vanderpool et al. because it would have provided an easy to use, efficient interface between the user and the database itself."

#### **1. Independent claim 1**

Independent claim 1 recites:

*"An apparatus for controlling display of database search items, comprising:  
a database including:*

*an element-data storage table in which has been stored, on a field-by-field basis, element data corresponding to the fields;*

*an item-name table which stipulates, field-by-field, an item name character that corresponds to a search-item name and a field name; and*

*a display-item designation table that stores ordered display-item data corresponding to said item name character for an ordered display on a display unit, the ordered display being determined by a user;*

*a select-command input device for applying a select command for designating the ordered display-item data;*

*a display-item data read-out device for reading out, from the display-item designation table, the ordered display-item data that conforms to the select command applied by said*

4-165US-FF

*select-command input device;*

*a search-item name read-out device for reading out, from the item-name table, said search-item name to be displayed on the display unit, said search-item name being designated by the ordered display-item data read out by said display-item data read-out device;*

*a display control unit for displaying said search-item name, which has been read out by said search-item name read-out device, on the display unit as a database search-item name; and*

*a customizing tool for changing search items displayed on a search page by inputting at least one of:*

*change-targeted item-name data for changing a search-item name in the item-name table;*

*data representing an additional search-item name for adding a search-item name to the item-name table;*

*display-item change data for changing a display-item in the display-item designation table; and*

*display-item add-on data for adding on a display-item to the display item designation table." (emphasis added)*

Appellant respectfully submits that the Examiner's position is flawed as a matter of fact and as a matter of law.

Specifically, Appellant submits that these references would not have been combined and even if combined, the combination would not teach or suggest each and every element of the claimed invention.

Vanderpool discloses a database generation process 30, in which a text record merge file 84 and a listing number file 86 are applied to a database builder program 34 (Vanderpool at col. 6, lines 33-36). In addition, various user defined inputs 32 are provided to the database builder 43 (Vanderpool at col. 6, lines 36-37). Such user defined inputs may include: lists of the fields of the various commonly formatted data which the database builder is to index in table form; lists of fields to be used as summary data; and the data to be used as tax data (Vanderpool at col. 6, lines 37-41).

Sheffield discloses a database interface and an interface customization tool for customizing only a display of **database contents** (i.e., not a display of **search items (e.g., search criteria) on a search page**) (Sheffield at col. 2, lines 1-5).

Appellant respectfully submits that these references would not have been combined as alleged by the Examiner. Indeed, these references are unrelated.

Specifically, Vanderpool is directed to a "method of transforming and storing data" (Vanderpool at Abstract). Although Vanderpool may disclose a search screen for searching a database (Vanderpool at Figure 10), nowhere does Vanderpool teach or suggest anything about customizing the search screen. On the contrary, Vanderpool is concerned only with **generating the database** and has very little concern for **generating a search page** for searching the database (e.g., **note that Figure 5 illustrates a "database generation process 30", not a "search page generation process"**). This is in complete contrast to Sheffield which is directed to a tool for customizing an interface between a user and a database (Sheffield at col. 2, lines 1-10).

Therefore, no person of ordinary skill in the art would have considered combining these disparate references, absent impermissible hindsight.

In addition, Appellant submits that the Examiner can point to no motivation or suggestion in the references to urge the combination as alleged by the Examiner. Indeed, contrary to the Examiner's allegations, neither of these references teach or suggest their combination. Therefore, Appellant respectfully submits that one of ordinary skill in the art would not have been so motivated to combine the references as alleged by the Examiner. Therefore, the Examiner has failed to make a prima facie case of obviousness.

Moreover, Appellant submits that neither Vanderpool, nor Sheffield, nor any combination thereof teaches or suggests a database which includes "*an item-name table which stipulates, field-by-field, an item name character that corresponds to a search-item name and a field name; and a display-item designation table that stores ordered display-item data corresponding to said item name character for an ordered display on a display unit, the ordered display being determined by a user*", as recited, for example, in claim 1.

As noted above, unlike conventional apparatuses with which a user who is not accustomed to handling databases will find difficulty in changing or adding to the names of **search items (e.g., search criteria)**, the claimed invention includes **an item-name table**

which stipulates, field-by-field, an item name character that corresponds to a search-item name and a field name; and a **display-item designation table** that stores ordered display-item data corresponding to said item name character for an ordered display on a display unit, the ordered display being determined by a user (Application at Figures 4-5). These unique features allow the **search items displayed on a search page** to be easily changed by simply inputting at least one of change-targeted item-name data, data representing an additional search-item name, display-item change data, and display-item add-on data. (Application at Figures 4-8 and 13-14; page 4, line 13-page 5, line 15). That is, these novel features allow a user not accustomed to handling databases to easily make **changes or additions to the search items on a search page** (Application at page 5, lines 23-25).

Clearly, these features are not taught or suggested by the cited references. Indeed, the Examiner has attempted to allege that Vanderpool teaches these features. However, the Examiner has **never** indicated specifically where these features are included in Vanderpool. Instead, the Examiner has made only the general allegations that "Vanderpool discloses these features". Appellant respectfully submits, however, that the Examiner is required to indicate **with specificity**, where the features of the claimed invention are allegedly taught or suggested by the cited references

Therefore, Appellant submits that the Office Action dated May 2, 2005, was incomplete under 37 C. F. R. 1.104 which states that "[t]he Examiner's action **will be complete** as to all matters" (emphasis added), and MPEP 707.07 which states that "[w]here a claim is rejected for any reason related to the merits thereof it should be 'rejected' and the ground of rejection fully and clearly stated" (emphasis added).

In fact, in the Office Action, the Examiner surprisingly makes only the general allegation that:

*" Vanderpool et al. discloses two tables contained within a database, one of these tables contains the full data items and user inputs including terms of search for the data items, while the other table contains parts of the full data items that are to be displayed, also field names are displayed and listed as a part of the table (Figure 5 and column 6, lines 34-44 of Vanderpool et al.)".*

That is, nowhere does the Examiner indicate to which tables he is referring. Moreover, the Examiner alleges only that the tables contain 1) "full data items, 2) user inputs

including terms of search for the data items, 3) parts of the full data items that are to be displayed.

That is, nowhere does the Examiner even allege that the "tables" in Vanderpool:

1) stipulate, field-by-field, an item name character (e.g., item-name number) that corresponds to a search-item name (e.g., product category, product name, etc.) and a field name (e.g., character data string 1, character data string 2, etc.); or

2) stores ordered display-item data (e.g., page number "1", item order "1", etc.) corresponding to the item name character (e.g., item-name number "1", item-name number "2", etc.) for an ordered display on a display unit.

Indeed, Appellant respectfully submits that as a minimum, the Examiner should be required to allege that these features are disclosed by Vanderpool. Indeed, Appellant would point out that to this day, Appellant is unclear about the features in Figure 5 and col. 6, lines 34-44 the Examiner is referring to in support of his position. Appellant suspects that the Examiner is referring to the index tables 36 and the data tables 38.

However, Vanderpool states only that the "indexed tables 36 [correspond] to each searchable field" and that the data tables 38 include (e.g., see Figure 7), "textual data record 54 for each listed property" such as listing data, tax data 104, links 106 for auxiliary program features, flags 108 for supplemental text, images and digital audio and video and other information 112 for record formatting (Vanderpool at col. 6, lines 34-65).

Thus, for example, nowhere does Vanderpool teach or suggest that either the index tables 36 or data tables 38 **include ordered display-item data** (e.g., "[d]ata specifying the order in which search items are to be displayed" (Application at page 5, lines 18-19)) which may allow a user to easily customize a search page by indicating the order of the search items on the search page. For example, in the claimed invention, as indicated above, the search items in the search page illustrated in Figure 7 may easily be changed to those of Figure 14 by simply using the customizing tool to change the display-item designation table from that in Figure 5 to that in Figure 13.

That is, by changing the ordered display-item data (e.g., item order) in Figure 13 which is associated with item-name number 1 (i.e., "product category") from "1" to "3", the field "Product Category" may be moved from first to third in the order presented on the search page, as illustrated in Figure 14. **Clearly, Vanderpool does not teach or suggest**

such **ordered display-item data** as in the claimed invention.

Moreover, Appellant would point out that **these tables to which the Examiner presumably refers are generated by the database builder 34 and not input by the user.** That is, these tables 36 and 38 can only be changed by changing the information which is input to the database builder 34. Therefore, Vanderpool certainly does not teach or suggest a customizing tool for changing search items displayed on a search page by inputting at least one of data for changing a search-item name, adding a search-item name, changing a display-item, or adding on a display-item in either of the tables 36 and 38.

Further, the Examiner alleges that "[t]here is no functional difference between one table that contains two delineated data types and two tables that contain only one type each" (Office Action at page 3). However, the Application states that in the claimed invention the display-item designation table may be associated with the item-name table by the item-name number (as illustrated by the "link" in Figure 2). Thus, the ordered display-item data can be read out from the display-item designation table (Application at page 3, line 25-page 4, line 2), and **the search-item name to be displayed** can be read out from the item-name table (e.g., Application at page 4, lines 1-7). Nowhere is such a "function" taught or suggested by Vanderpool.

Likewise, Sheffield does not teach or suggest these features. Indeed, like Vanderpool, nowhere does Sheffield teach or suggest a database having a table that stipulates, field-by-field, an **item name character** (e.g., item-name number) that corresponds to a **search-item name** (e.g., product category, product name, etc.) and a **field name** (e.g., character data string 1, character data string 2, etc.), or a table that stores **ordered display-item data** (e.g., page number "1", item order "1", etc.) **corresponding to the item name character** (e.g., item-name number "1", item-name number "2", etc.) for an ordered display on a display unit.

In addition, Appellant would point out that the Examiner merely alleges that "Sheffield discloses a method of editing items in tables of a database" (Office Action at page 3). However, as Appellant pointed out in the Amendment filed herein on January 10, 2005, the claimed invention is not merely directed to "editing items in tables of a database".

Indeed, as noted above, an object of the claimed invention is to allow a user not accustomed to handling databases to easily make **changes or additions to the search items**

on a search page. In fact, the claimed invention may be used to change the search items on a search page without necessarily changing element data which is stored on a field-by-field basis in a database. That is, the claimed invention includes a customizing tool for changing search items displayed on the search page (Application at Figure 1; page 13, line 6-page 19, line 23).

The Examiner has never indicated where Sheffield teaches or suggests a tool which is equivalent to the "customizing tool" of the claimed invention. Instead, the Examiner merely identifies portions of Sheffield which pertain to editing data in a database (e.g., col. 22, line 60-col. 23, line 9). **However, Appellant would again point out that changing search items (e.g., search criteria) displayed on a search page is completed different from changing data in a database.**

Indeed, nowhere does Sheffield teach or suggest changing search items displayed on a search page. Instead, as pointed out by the Examiner, Sheffield merely discloses changing data in a database or the manner in which data is displayed (e.g., see Sheffield at col. 23, lines 5-9) other than on a search page.

Indeed, assuming (arguendo) that Figure 1 in Sheffield may be considered a "search page" for searching a database, and assuming (arguendo) that "Employee ID" could somehow be considered a "search item", nowhere does Sheffield teach or suggest data (e.g., data equivalent to the ordered display-item data in the claimed invention) that can be changed such that the order in which "Employee ID" is presented in Figure 1 could be changed,

Further, nowhere does Sheffield teach or suggest data that could be changed such that "Employee ID" could be changed, for example, to "Employee Hair Color" or "Employee's Favorite Dessert" on the search page. Indeed, Appellant submits that **regardless of how the user in Sheffield prefers to edit the data in the database, the page illustrated in Figure 1 will always be the same.** Indeed, nowhere does Sheffield teach or suggest anything even remotely related to changing a search item on a search page.

Again, as Appellant pointed out in the January 10, 2005 Amendment, Figure 7 in the present application illustrates a search page which includes the search items "PRODUCT CATEGORY", "PRODUCT NAME", etc. The claimed invention allows a user (e.g., a non-expert user) to easily change, add to, or delete from, **the search items (e.g., search criteria)** on the search page. Thus, for example, a user may use the claimed invention to change the

search items displayed on the search page or the order of the search items displayed on the search page, as illustrated in Figure 8. Thus, for example, the user may use the claimed invention to easily replace the search item "PRODUCT CATEGORY" with the search item "PRODUCT CLASS". Nowhere are these novel features taught or suggested by the cited references.

Therefore, Appellant submits that these references would not have been combined and even if combined, the combination would not teach or suggest each and every element of the claimed invention. Therefore, the Board is respectfully requested to withdraw this rejection.

## **2. Independent claim 6**

Independent claim 6 recites:

*"A method of controlling display of search items of a database including an element-data storage table in which has been stored, on a field-by-field basis, element data corresponding to the fields, an item-name table which stipulates, field-by-field, an item name character that corresponds to a search-item name and a field name, and a display-item designation table that stores ordered display-item data corresponding to said item name character for an ordered display determined by a user on a display unit, the method comprising:*

*applying a select command for designating the ordered display-item data;*

*reading out, from the display-item designation table, the ordered display-item data that conforms to the select command applied;*

*reading out, from the item-name table, a search-item name to be displayed on the display unit, the search-item name being designated by the ordered display-item data read out;*

*displaying the search-item name, which has been read out, on the display unit as a database search-item name in an ordered display determined by a user; and*

*changing search items displayed on a search page by using a customizing tool, said changing said search items comprising at least one of:*

*inputting change-targeted item-name data for changing a search-item name in the item-name table;*

*inputting data representing an additional search-item name for adding a*



*search- item name to the item-name table;*

*inputting display-item change data for changing a display-item in the display-item designation table; and*

*inputting display-item add-on data for adding on a display-item to the display item designation table".*

Appellant respectfully submits that the Examiner's position is flawed as a matter of fact and as a matter of law. Specifically, neither Vanderpool, nor Sheffield, nor any alleged combination thereof teaches or suggests *"an item-name table which stipulates, field-by-field, an item name character that corresponds to a search-item name and a field name, and a display-item designation table that stores ordered display-item data corresponding to said item name character for an ordered display determined by a user on a display unit ", nor "changing search items displayed on a search page by using a customizing tool, said changing said search items comprising at least one of: inputting change-targeted item-name data for changing a search-item name in the item-name table; inputting data representing an additional search-item name for adding a search- item name to the item-name table; inputting display-item change data for changing a display-item in the display-item designation table"*, as recited in claim 6.

Appellant notes that these features are similar to the features discussed above with respect to claim 1. Therefore, Appellant's arguments made above with respect to claim 1 are incorporated by reference herein.

Therefore, Appellant respectfully submits that these references would not have been combined and even if combined, the combination would not teach or suggest each and every element of the claimed invention of claim 6.

Therefore, the Board is respectfully requested to withdraw this rejection.

### **3. Independent claim 19**

Independent claim 19 recites:

*"An apparatus for controlling display of database search items, comprising:  
a database comprising:*

*a general purpose table which stores data corresponding to a plurality of  
products according to a data number;*

*an item name definition table which stores a plurality of search items according to an item name character; and*  
*a page definition table that stores an item name character and an order of display for a search item in said plurality of search items to be displayed on a search page; and*  
*a customizing tool for changing search items displayed on said search page by at least one of adding data to, deleting data from, and changing data in at least one of said item name definition table and said page definition table".*

Appellant respectfully submits that the Examiner's position is flawed as a matter of fact and as a matter of law. Specifically, neither Vanderpool, nor Sheffield, nor any alleged combination thereof teaches or suggests "*an item name definition table which stores a plurality of search items according to an item name character; and a page definition table that stores an item name character and an order of display for a search item in said plurality of search items to be displayed on a search page*", nor "*a customizing tool for changing search items displayed on said search page by at least one of adding data to, deleting data from, and changing data in at least one of said item name definition table and said page definition table*", as recited in claim 19.

Appellant notes that these features are similar to the features discussed above with respect to claim 1. Therefore, Appellant's arguments made above with respect to claim 1 are incorporated by reference herein.

Therefore, Appellant respectfully submits that these references would not have been combined and even if combined, the combination would not teach or suggest each and every element of the claimed invention of claim 19.

Therefore, the Board is respectfully requested to withdraw this rejection.

#### **4. Dependent Claim 2**

Claim 2 depends from claim 1 and further recites "*wherein said customizing tool comprises: a change-data input device for inputting said change-targeted item-name data, which represents a change-targeted item name for changing the name of an item that has been stipulated in the item-name table, and item name change data representing the name of an item after a change; and an item-name changing device for changing, to the name of an*

*item represented by the item-name change data, an item name decided by the change-targeted item name data, which is among the item names specified in the item-name table, input from said change-data input device".*

This feature is discussed in the present Application at page 8, lines 2-5, page 19, lines 18-23).

The Examiner does not allege the alleged references teach or suggest these features, but alleges only that Sheffield discloses a method of editing terms in tables of a database at col. 22, line 60-col. 23, line 9.

Appellant respectfully submits that the Examiner's position is flawed as a matter of fact and as a matter of law. Specifically, nowhere does the cited passage teach or suggest this feature.

Therefore, Appellant respectfully submits that neither Vanderpool, nor Sheffield, nor any alleged combination thereof teach or suggests this feature and, therefore, clearly does not teach or suggest each and every element of the claimed invention as recited in claim 2.

Therefore, the Board is respectfully requested to withdraw this rejection.

### **5. Dependent Claim 3**

Claim 3 depends from claim 1 and further recites "*wherein said customizing tool comprises: an additional-item-name data input device for inputting said data representing an additional item name which adds on an item name specified in the item-name table; and an item-name add-on device for storing an additional item name, which is represented by additional-item-name data that has been input from said additional-item-name data input device, in the item-name table in correspondence with the field*".

This feature is discussed in the present Application at page 8, lines 2-5, page 19, lines 18-23).

The Examiner does not allege that the alleged references teach or suggest these features, but alleges only that Sheffield discloses a method of editing terms in tables of a database at col. 22, line 60-col. 23, line 9.

Appellant respectfully submits that the Examiner's position is flawed as a matter of fact and as a matter of law. Specifically, nowhere does the cited passage teach or suggest this feature.

Therefore, Appellant respectfully submits that neither Vanderpool, nor Sheffield, nor any alleged combination thereof teach or suggests this feature and, therefore, clearly does not teach or suggest each and every element of the claimed invention as recited in claim 3.

Therefore, the Board is respectfully requested to withdraw this rejection.

**6. Dependent Claim 4**

Claim 4 depends from claim 1 and further recites "*wherein said customizing tool comprises: a display-item change-data input device for inputting said display-item change data for changing a display-item that has been stored in the display-item designation table; and a device for changing the ordered display-item data, which has been stored in the display-item designation table, in accordance with display-item change data that has been input from said display-item change-data input device*".

This feature is discussed in the present Application at page 8, lines 2-5, page 19, lines 18-23).

The Examiner does not allege that the alleged references teach or suggest these features, but alleges only that Sheffield discloses a method of editing terms in tables of a database at col. 22, line 60-col. 23, line 9.

Appellant respectfully submits that the Examiner's position is flawed as a matter of fact and as a matter of law. Specifically, nowhere does the cited passage teach or suggest this feature.

Therefore, Appellant respectfully submits that neither Vanderpool, nor Sheffield, nor any alleged combination thereof teach or suggests this feature and, therefore, clearly does not teach or suggest each and every element of the claimed invention as recited in claim 4.

Therefore, the Board is respectfully requested to withdraw this rejection.

**7. Dependent Claim 5**

Claim 5 depends from claim 1 and further recites "*wherein said customizing tool comprises: a display-item add-on data input device for inputting said display-item add-on data for adding on the ordered display-item data that has been stored in the display item designation table; and a device for adding on the ordered display-item data stored in the display-item designation table in accordance with the display-item add-on data that has been*

*input from said display-item add-on data input device".*

This feature is discussed in the present Application at page 8, lines 2-5, page 19, lines 18-23).

The Examiner does not indicate where the alleged references teach or suggest these features, but alleges only that Sheffield discloses a method of editing terms in tables of a database at col. 22, line 60-col. 23, line 9.

Appellant respectfully submits that the Examiner's position is flawed as a matter of fact and as a matter of law. Specifically, nowhere does the cited passage teach or suggest this feature.

Therefore, Appellant respectfully submits that neither Vanderpool, nor Sheffield, nor any alleged combination thereof teach or suggests this feature and, therefore, clearly does not teach or suggest each and every element of the claimed invention as recited in claim 6.

Therefore, the Board is respectfully requested to withdraw this rejection.

#### **8. Dependent Claim 7**

Claim 7 depends from claim 1 and further recites "*wherein said customizing tool comprises: a change-data input device for inputting said change targeted item-name data, which represents a change targeted item name for changing the name of an item that has been stipulated in the item-name table, and item name change data representing the name of an item after a change*".

This feature is discussed in the present Application at page 8, lines 2-5, page 19, lines 18-23).

The Examiner does not indicate where the alleged references teach or suggest these features, but alleges only that Sheffield discloses a method of editing terms in tables of a database at col. 22, line 60-col. 23, line 9.

Appellant respectfully submits that the Examiner's position is flawed as a matter of fact and as a matter of law. Specifically, nowhere does the cited passage teach or suggest this feature.

Therefore, Appellant respectfully submits that neither Vanderpool, nor Sheffield, nor any alleged combination thereof teach or suggests this feature and, therefore, clearly does not teach or suggest each and every element of the claimed invention as recited in claim 7.

Therefore, the Board is respectfully requested to withdraw this rejection.

**9. Dependent Claim 8**

Claim 8 depends from claim 1 and further recites "*wherein said customizing tool comprises: an additional-item-name data input device for inputting said data representing an additional item name which adds on an item name specified in the item-name table*".

This feature is discussed in the present Application at page 8, lines 2-5, page 19, lines 18-23).

The Examiner does not indicate where the alleged references teach or suggest these features, but alleges only that Sheffield discloses a method of editing terms in tables of a database at col. 22, line 60-col. 23, line 9.

Appellant respectfully submits that the Examiner's position is flawed as a matter of fact and as a matter of law. Specifically, nowhere does the cited passage teach or suggest this feature.

Therefore, Appellant respectfully submits that neither Vanderpool, nor Sheffield, nor any alleged combination thereof teach or suggests this feature and, therefore, clearly does not teach or suggest each and every element of the claimed invention as recited in claim 8.

Therefore, the Board is respectfully requested to withdraw this rejection.

**10. Dependent Claim 9**

Claim 9 depends from claim 10 and further recites "*wherein said customizing tool comprises: a display-item change-data input device for inputting said display-item change data for changing a display-item that has been stored in the display-item designation table*".

This feature is discussed in the present Application at page 8, lines 2-5, page 19, lines 18-23).

The Examiner does not indicate where the alleged references teach or suggest these features, but alleges only that Sheffield discloses a method of editing terms in tables of a database at col. 22, line 60-col. 23, line 9.

Appellant respectfully submits that the Examiner's position is flawed as a matter of fact and as a matter of law. Specifically, nowhere does the cited passage teach or suggest this feature.

Therefore, Appellant respectfully submits that neither Vanderpool, nor Sheffield, nor any alleged combination thereof teach or suggests this feature and, therefore, clearly does not teach or suggest each and every element of the claimed invention as recited in claim 9.

Therefore, the Board is respectfully requested to withdraw this rejection.

**11. Dependent Claim 10**

Claim 10 depends from claim 1 and further recites "*wherein said customizing tool comprises: a display-item add-on data input device for inputting said display-item add-on data for adding on the ordered display-item data that has been stored in the display item designation table*".

This feature is discussed in the present Application at page 8, lines 2-5, page 19, lines 18-23).

The Examiner does not indicate where the alleged references teach or suggest these features, but alleges only that Sheffield discloses a method of editing terms in tables of a database at col. 22, line 60-col. 23, line 9.

Appellant respectfully submits that the Examiner's position is flawed as a matter of fact and as a matter of law. Specifically, nowhere does the cited passage teach or suggest this feature.

Therefore, Appellant respectfully submits that neither Vanderpool, nor Sheffield, nor any alleged combination thereof teach or suggests this feature and, therefore, clearly does not teach or suggest each and every element of the claimed invention as recited in claim 10.

Therefore, the Board is respectfully requested to withdraw this rejection.

**B. The Rejection of claims 11-18 under 35 U.S.C. 103(a) as being allegedly unpatentable over Vanderpool in view of Sheffield as applied to claim 1 above, and further in view of Blinn et al. (US Patent Number 5,897,622)**

As set forth on pages 5-6 of the Office Action dated May 2, 2005, the Examiner rejected claims 11-18 under 35 U.S.C. 103(a) as being allegedly unpatentable over Vanderpool in view of Sheffield as applied to claim 1 above, and further in view of Blinn et al. (US Patent Number 5,897,622) stating:

*"Regarding dependent claim 11 -18, Vanderpool et al. discloses a method in which a database system that is implemented via software comprises a database controller which controls the operation and searches of said database system (Figure 5, column 3, lines 21-24, and column 6, lines 34-44 of Vanderpool et al.). Neither Vanderpool et al. nor Sheffield disclose a method in which the database system contains a storage unit for storing data representing a template, is searched via client communication to the internet, and has a search page generating unit for generating an HTML page data for a search page which represents the search results and accepts input for search criteria all of which is provide by a web server.*

*However, Blinn discloses a method in which a web server generates HTML search pages based on HTML templates stored in a storage unit linked to a datatbase which may be used to search by a client using an internet connection, at which point results will be provided by a page that is generated containing the search results based on HTML templates (Figure 12, column 1, lines 42-67, and column 17, lines 18-41 of Blinn). It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined the methods of Vanderpool et al. and Sheffield with the methods of Blinn because it would have allowed information in the database to be provided to a global audience.*

Appellant respectfully submits that the Examiner's position is flawed as a matter of fact and as a matter of law.

The Examiner alleges that Vanderpool would have been combined with Sheffield, and that the alleged Vanderpool/Sheffield combination would have been further combined with Blinn to form the invention of claims 11-18. Appellant submits, however, that these references would not have been combined and even if combined, the combination would not teach or suggest each and every element of the claimed invention.

Blinn discloses an electronic shopping and merchandising system which is intended to provide a capability to generate product information pages dynamically during order processing (Blinn at col. 3, lines 21-25).

However, Appellant respectfully submits that these references would not have been combined as alleged by the Examiner. Indeed, these references are completely unrelated, and



- 
- no person of ordinary skill in the art would have considered combining these disparate
- references, absent impermissible hindsight.

In fact, Appellant submits that the Examiner can point to no motivation or suggestion in the references to urge the combination as alleged by the Examiner. Indeed, contrary to the Examiner's allegations, neither of these references teach or suggest their combination.

Therefore, Appellant respectfully submits that one of ordinary skill in the art would not have been so motivated to combine the references as alleged by the Examiner. Therefore, the Examiner has failed to make a prima facie case of obviousness.

Moreover, Appellant submits that neither Vanderpool, nor Sheffield, nor Blinn, nor any combination thereof teaches or suggests "*an item-name table which stipulates, field-by-field, an item name character that corresponds to a search-item name and a field name; and a display-item designation table that stores ordered display-item data corresponding to said item name character for an ordered display on a display unit, the ordered display being determined by a user*" nor "*a customizing tool for changing search items displayed on said search page by inputting at least one of: change-targeted item-name data for changing a search-item name in the item-name table; data representing an additional search-item name for adding a search- item name to the item-name table; display-item change data for changing a display-item in the display-item designation table; and display-item add-on data for adding on a display-item to the display item designation table*", as recited, for example, in claim 1.

As noted above, these novel features allow a user not accustomed to handling databases to make changes or additions to the search items on a search page (Application at page 2, lines 1-5).

Clearly, these features are not taught or suggested by the Blinn. Indeed, Appellant would point out that nowhere does the Examiner allege that Blinn teaches or suggests a database including *an item-name table or a display-item designation table, or a customizing tool for changing search items displayed on a search page*. Instead, the Examiner merely attempts to allege that Blinn discloses a method in which a web server generates HTML search pages.

The Examiner attempts to rely on Figure 12, and col. 1, lines 42-67 and col. 17, lines 18-41 in Blinn to support his position. However, nowhere does Figure 12 or these passages

teach or suggest a database including *an item-name table or a display-item designation table*.

Certainly, Figure 12 and these passages do not teach or suggest a customization tool for changing search items (e.g., search criteria) on a search page. Indeed, Figure 12 merely illustrates a data flow for the dynamic gate generator 125, database module 127 and the order processing module 129. That is, Figure 12 does not even teach or suggest a search page, let alone a tool for changing a search item on a search page. Therefore, Blinn clearly does not make up for the deficiencies of Vanderpool and Sheffield.

Therefore, Appellant submits that these references would not have been combined and even if combined, the combination would not teach or suggest each and every element of the claimed invention of any of claims 11-18. Therefore, the Examiner is respectfully requested to withdraw this rejection.

#### **1. Dependent Claim 11**

Claim 11 depends from claim 1 and recites "*a database system which includes said database, said database system further comprising: a hypertext markup language (HTML) template storage unit for storing data representing a template for displaying said search page*".

This feature is discussed in the present Application at page 8, lines 2-5; page 16, lines 16-19; page 19, lines 18-23.

The Examiner alleges that Blinn discloses (e.g., at Figure 12, col. 1, lines 42-67 and col. 17, lines 18-41), a method in which a web server generates HTML search pages based on HTML templates stored in a storage unit linked to a database which may be used to search by a client.

However, Appellant respectfully submits that the Examiner's position is flawed as a matter of fact and as a matter of law. Specifically, nowhere does the cited passage teach or suggest this feature.

Therefore, Appellant respectfully submits that neither Vanderpool, nor Sheffield, nor Blinn, nor any alleged combination thereof teach or suggests this feature and, therefore, clearly does not teach or suggest each and every element of the claimed invention as recited in claim 11. Therefore, the Board is respectfully requested to withdraw this rejection.

## **2. Dependent Claim 12**

Claim 12 depends from claim 11 and further recites "*wherein said database system is in communication with a client computer for performing a search of said database via the Internet*".

This feature is discussed in the present Application at Figure 1; page 20, lines 5-27.

The Examiner alleges that Blinn discloses (e.g., at Figure 12, col. 1, lines 42-67 and col. 17, lines 18-41), a method in which a web server generates HTML search pages based on HTML templates stored in a storage unit linked to a database which may be used to search by a client.

However, Appellant respectfully submits that the Examiner's position is flawed as a matter of fact and as a matter of law. Specifically, nowhere does the cited passage teach or suggest this feature.

Therefore, Appellant respectfully submits that neither Vanderpool, nor Sheffield, nor Blinn, nor any alleged combination thereof teach or suggests this feature and, therefore, clearly does not teach or suggest each and every element of the claimed invention as recited in claim 12. Therefore, the Board is respectfully requested to withdraw this rejection.

## **3. Dependent Claim 13**

Claim 13 depends from claim 11 and further recites "*wherein said database system and said customizing tool comprise a software-implemented database system and a software-implemented customizing tool, respectively*".

This feature is discussed in the present Application at page 8, lines 6-9.

The Examiner alleges that Blinn discloses (e.g., at Figure 12, col. 1, lines 42-67 and col. 17, lines 18-41), a method in which a web server generates HTML search pages based on HTML templates stored in a storage unit linked to a database which may be used to search by a client.

However, Appellant respectfully submits that the Examiner's position is flawed as a matter of fact and as a matter of law. Specifically, nowhere does the cited passage teach or suggest this feature.

Therefore, Appellant respectfully submits that neither Vanderpool, nor Sheffield, nor

- Blinn, nor any alleged combination thereof teach or suggests this feature and, therefore,
- clearly does not teach or suggest each and every element of the claimed invention as recited in claim 13. Therefore, the Board is respectfully requested to withdraw this rejection.

#### **4. Dependent Claim 14**

Claim 14 depends from claim 13 and further recites "*wherein said database system further comprises: a database controller for controlling searches of data stored in said database*".

This feature is discussed in the present Application at Figure 1; page 7, lines 14-25.

The Examiner alleges that Blinn discloses (e.g., at Figure 12, col. 1, lines 42-67 and col. 17, lines 18-41), a method in which a web server generates HTML search pages based on HTML templates stored in a storage unit linked to a database which may be used to search by a client.

However, Appellant respectfully submits that the Examiner's position is flawed as a matter of fact and as a matter of law. Specifically, nowhere does the cited passage teach or suggest this feature.

Therefore, Appellant respectfully submits that neither Vanderpool, nor Sheffield, nor Blinn, nor any alleged combination thereof teach or suggests this feature and, therefore, clearly does not teach or suggest each and every element of the claimed invention as recited in claim 14. Therefore, the Board is respectfully requested to withdraw this rejection.

#### **5. Dependent Claim 15**

Claim 15 depends from claim 14 and further recites "*wherein said database system further comprises: a search page generating unit for generating HTML page data for said search page*".

This feature is discussed in the present Application at Figure 1; page 20, lines 18-27.

The Examiner alleges that Blinn discloses (e.g., at Figure 12, col. 1, lines 42-67 and col. 17, lines 18-41), a method in which a web server generates HTML search pages based on HTML templates stored in a storage unit linked to a database which may be used to search by a client.

However, Appellant respectfully submits that the Examiner's position is flawed as a

- matter of fact and as a matter of law. Specifically, nowhere does the cited passage teach or
- suggest this feature.

Therefore, Appellant respectfully submits that neither Vanderpool, nor Sheffield, nor Blinn, nor any alleged combination thereof teach or suggests this feature and, therefore, clearly does not teach or suggest each and every element of the claimed invention as recited in claim 15. Therefore, the Board is respectfully requested to withdraw this rejection.

#### **6. Dependent Claim 16**

Claim 16 depends from claim 15 and further recites "*wherein said HTML page data comprises data representing a page for inputting search criteria, data representing a page for displaying search results, and data representing a page for inputting data to said database*".

This feature is discussed in the present Application at page 7, lines 14-25.

The Examiner alleges that Blinn discloses (e.g., at Figure 12, col. 1, lines 42-67 and col. 17, lines 18-41), a method in which a web server generates HTML search pages based on HTML templates stored in a storage unit linked to a database which may be used to search by a client.

However, Appellant respectfully submits that the Examiner's position is flawed as a matter of fact and as a matter of law. Specifically, nowhere does the cited passage teach or suggest this feature.

Therefore, Appellant respectfully submits that neither Vanderpool, nor Sheffield, nor Blinn, nor any alleged combination thereof teach or suggests this feature and, therefore, clearly does not teach or suggest each and every element of the claimed invention as recited in claim 16. Therefore, the Board is respectfully requested to withdraw this rejection.

#### **7. Dependent Claim 17**

Claim 17 depends from claim 15 and further recites "*wherein said database system further comprises: a controller for controlling an operation of said database system*".

This feature is discussed in the present Application at Figure 1; page 7, lines 14-25.

The Examiner alleges that Blinn discloses (e.g., at Figure 12, col. 1, lines 42-67 and col. 17, lines 18-41), a method in which a web server generates HTML search pages based on

HTML templates stored in a storage unit linked to a database which may be used to search by a client.

However, Appellant respectfully submits that the Examiner's position is flawed as a matter of fact and as a matter of law. Specifically, nowhere does the cited passage teach or suggest this feature.

Therefore, Appellant respectfully submits that neither Vanderpool, nor Sheffield, nor Blinn, nor any alleged combination thereof teach or suggests this feature and, therefore, clearly does not teach or suggest each and every element of the claimed invention as recited in claim 17. Therefore, the Board is respectfully requested to withdraw this rejection.

#### **8. Dependent Claim 18**

Claim 18 depends from claim 17 and further recites "*wherein said database system further comprises: a Web server in communication with said controller*".

This feature is discussed in the present Application at Figure 1; page 7, lines 12-13.

The Examiner alleges that Blinn discloses (e.g., at Figure 12, col. 1, lines 42-67 and col. 17, lines 18-41), a method in which a web server generates HTML search pages based on HTML templates stored in a storage unit linked to a database which may be used to search by a client.

However, Appellant respectfully submits that the Examiner's position is flawed as a matter of fact and as a matter of law. Specifically, nowhere does the cited passage teach or suggest this feature.

Therefore, Appellant respectfully submits that neither Vanderpool, nor Sheffield, nor Blinn, nor any alleged combination thereof teach or suggests this feature and, therefore, clearly does not teach or suggest each and every element of the claimed invention as recited in claim 18. Therefore, the Board is respectfully requested to withdraw this rejection.

Therefore, in short, the dependent claims of the present Application define elements and limitations which further place the claimed invention squarely in the realm of statutory subject matter and which provide a useful, tangible and concrete result.

Therefore, dependent claims like independent claims 1, 6 and 19, include at least one element which is not taught or suggested by the cited references, or any combination of the cited references.

- In view of all of the foregoing, Appellant respectfully submits that the Examiner's
- rejections are erroneous as a matter of fact and law

### VIII. CONCLUSION

In view of the foregoing, Appellant submits that claims 1-19, all the claims presently pending in the application, are patentably distinct from the prior art of record and in condition for allowance. Thus, the Board is respectfully requested to remove the rejections of claims 1-19.

Please charge any deficiencies and/or credit any overpayments necessary to enter this paper to Attorney's Deposit Account number 50-0481.

Dated: 9/30/05

Respectfully submitted,



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**CLAIMS APPENDIX**

1. An apparatus for controlling display of database search items, comprising:
  - a database including:
    - an element-data storage table in which has been stored, on a field-by-field basis, element data corresponding to the fields;
    - an item-name table which stipulates, field-by-field, an item name character that corresponds to a search-item name and a field name; and
    - a display-item designation table that stores ordered display-item data corresponding to said item name character for an ordered display on a display unit, the ordered display being determined by a user;
    - a select-command input device for applying a select command for designating the ordered display-item data;
    - a display-item data read-out device for reading out, from the display-item designation table, the ordered display-item data that conforms to the select command applied by said select-command input device;
    - a search-item name read-out device for reading out, from the item-name table, said search-item name to be displayed on the display unit, said search-item name being designated by the ordered display-item data read out by said display-item data read-out device;
    - a display control unit for displaying said search-item name, which has been read out by said search-item name read-out device, on the display unit as a database search-item name; and
    - a customizing tool for changing search items displayed on a search page by inputting at least one of:
      - change-targeted item-name data for changing a search-item name in the item-name table;
      - data representing an additional search-item name for adding a search-item name to the item-name table;
      - display-item change data for changing a display-item in the display-item designation table; and
      - display-item add-on data for adding on a display-item to the display item



designation table.

2. The apparatus according to claim 1, wherein said customizing tool comprises:  
a change-data input device for inputting said change-targeted item-name data, which represents a change-targeted item name for changing the name of an item that has been stipulated in the item-name table, and item name change data representing the name of an item after a change; and  
an item-name changing device for changing, to the name of an item represented by the item-name change data, an item name decided by the change-targeted item name data, which is among the item names specified in the item-name table, input from said change-data input device.
3. The apparatus according to claim 1, wherein said customizing tool comprises:  
an additional-item-name data input device for inputting said data representing an additional item name which adds on an item name specified in the item-name table; and  
an item-name add-on device for storing an additional item name, which is represented by additional-item-name data that has been input from said additional-item-name data input device, in the item-name table in correspondence with the field.
4. The apparatus according to claim 1, wherein said customizing tool comprises:  
a display-item change-data input device for inputting said display-item change data for changing a display-item that has been stored in the display-item designation table; and  
a device for changing the ordered display-item data, which has been stored in the display-item designation table, in accordance with display-item change data that has been input from said display-item change-data input device.
5. The apparatus according to claim 1, wherein said customizing tool comprises:  
a display-item add-on data input device for inputting said display-item add-on data for adding on the ordered display-item data that has been stored in the display item designation table; and  
a device for adding on the ordered display-item data stored in the display-item

- designation table in accordance with the display-item add-on data that has been input from said display-item add-on data input device.

6. A method of controlling display of search items of a database including an element-data storage table in which has been stored, on a field-by-field basis, element data corresponding to the fields, an item-name table which stipulates, field-by-field, an item name character that corresponds to a search-item name and a field name, and a display-item designation table that stores ordered display-item data corresponding to said item name character for an ordered display determined by a user on a display unit, the method comprising:

- applying a select command for designating the ordered display-item data;
- reading out, from the display-item designation table, the ordered display-item data that conforms to the select command applied;
- reading out, from the item-name table, a search-item name to be displayed on the display unit, the search-item name being designated by the ordered display-item data read out;
- displaying the search-item name, which has been read out, on the display unit as a database search-item name in an ordered display determined by a user; and
- changing search items displayed on a search page by using a customizing tool, said changing said search items comprising at least one of:
  - inputting change-targeted item-name data for changing a search-item name in the item-name table;
  - inputting data representing an additional search-item name for adding a search-item name to the item-name table;
  - inputting display-item change data for changing a display-item in the display-item designation table; and
  - inputting display-item add-on data for adding on a display-item to the display-item designation table.

7. The apparatus according to claim 1, wherein said customizing tool comprises:  
a change-data input device for inputting said change targeted item-name data, which represents a change targeted item name for changing the name of an item that has been

stipulated in the item-name table, and item name change data representing the name of an item after a change.

8. The apparatus according to claim 1, wherein said customizing tool comprises:  
an additional-item-name data input device for inputting said data representing an additional item name which adds on an item name specified in the item-name table.
9. The apparatus according to claim 1, wherein said customizing tool comprises:  
a display-item change-data input device for inputting said display-item change data for changing a display-item that has been stored in the display-item designation table.
10. The apparatus according to claim 1, wherein said customizing tool comprises:  
a display-item add-on data input device for inputting said display-item add-on data for adding on the ordered display-item data that has been stored in the display item designation table.
11. The apparatus according to claim 1, further comprising:  
a database system which includes said database, said database system further comprising:  
a hypertext markup language (HTML) template storage unit for storing data representing a template for displaying said search page.
12. The apparatus according to claim 11, wherein said database system is in communication with a client computer for performing a search of said database via the Internet.
13. The apparatus according to claim 11, wherein said database system and said customizing tool comprise a software-implemented database system and a software-implemented customizing tool, respectively.
14. The apparatus according to claim 13, wherein said database system further comprises:

a database controller for controlling searches of data stored in said database.

15. The apparatus according to claim 14, wherein said database system further comprises:  
a search page generating unit for generating HTML page data for said search page.

16. The apparatus according to claim 15, wherein said HTML page data comprises data representing a page for inputting search criteria, data representing a page for displaying search results, and data representing a page for inputting data to said database.

17. The apparatus according to claim 15, wherein said database system further comprises:  
a controller for controlling an operation of said database system.

18. The apparatus according to claim 17, wherein said database system further comprises:  
a Web server in communication with said controller.

19. An apparatus for controlling display of database search items, comprising:  
a database comprising:

a general purpose table which stores data corresponding to a plurality of  
products according to a data number;

an item name definition table which stores a plurality of search items  
according to an item name character; and

a page definition table that stores an item name character and an order of  
display for a search item in said plurality of search items to be displayed on a search page;  
and

a customizing tool for changing search items displayed on said search page by at least  
one of adding data to, deleting data from, and changing data in at least one of said item name  
definition table and said page definition table.